
STONE CONROY

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May 12, 2022

VIA ELECTRONIC FILING

Honorable Freda L. Wolfson, U.S.D.J.
United States District Court
District of New Jersey - Trenton Vicinage
Clarkson S. Fisher Federal Building & U.S. Courthouse
402 E. State Street
Trenton, NJ 08608

RE: Romero v. Ahsan
Civil No. 13-7695 (FLW/DEA)

Dear Judge Wolfson:

As Your Honor is aware, the undersigned is *pro bono* counsel for Plaintiff, Michael Romero, in the above-referenced matter. On March 23, 2022, the parties reached a settlement, and the Court entered a 60 Day Order of Administrative Termination. See Docket Entry [116]. However, Defendant only provided me with an initial draft of the settlement agreement for review earlier today. Given this inordinate delay, and the time necessary to (1) finalize any proposed changes with defense counsel, (2) forward a final draft to Plaintiff, (3) schedule a legal call with Plaintiff through the Arizona State Department of Corrections to review the settlement agreement, and (4) receive the signed agreement back from Plaintiff, settlement will not be consummated before May 23, 2022. Given these circumstances, Plaintiff respectfully requests the Court extend its Order of Administrative Termination to June 30, 2022.

Defense counsel consents to this request.

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Respectfully yours,

s/ Surinder K. Aggarwal
SURINDER K. AGGARWAL

SKA/ms

cc: Margaret Raymond-Flood, Esquire
Michael Romero